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Attorneys for Defendant Lighthouse List Company, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY CORPORATION,
*as an assignee of individuals who are
Covered Persons, JANE DOE-1, a law
enforcement officer, JANE DOE-2, a law
enforcement officer, PATRICK COLLIGAN,*

Plaintiffs,

v.

LIGHTHOUSE LIST COMPANY, LLC,
RICHARD ROES 1-10, *fictitious names of
unknown individuals* and ABC COMPANIES
1-10, *fictitious names of unknown entities,*

Defendants.

CASE NO. 1:24-cv-11443

**APPLICATION FOR EXTENSION OF
TIME TO ANSWER, MOVE, OR
OTHERWISE REPLY**

[Local Civil Rule 6.1(b)]

This is an application for a Clerk's Order extending the time within which defendant LIGHTHOUSE LIST COMPANY, LLC ("Lighthouse List") may answer, move, or otherwise reply to the second amended complaint filed by plaintiffs (Dkt. No. 1-4), and it is represented that:

1. This action was removed to this Court from the Superior Court of New Jersey, Law Division, Middlesex County, by the filing of a Notice of Removal on December 23, 2024. *See* Dkt. No. 1.

2. On November 11, 2024, plaintiffs filed their first amended complaint in state court, which was the first pleading in this action that named Lighthouse List as a defendant. *See* Dkt. No. 1, ¶ 1; Dkt. No. 1-2.

3. On November 27, 2024, the parties submitted a joint letter to the state court in which Lighthouse List advised the state court that it consented to the filing of and waived service of plaintiffs' first amended complaint. *See* Dkt. No. 1-3 at 1.

4. On December 17, 2024, plaintiffs filed in state court a second amended complaint against Lighthouse List. *See* Dkt. No. 1, ¶ 3; Dkt. No. 1-4.

5. Lighthouse List has not received from plaintiffs' counsel (or executed or returned) acknowledgment of service forms as to the first amended complaint or second amended complaint. *See* Dkt. No. 1, ¶ 4.

6. Regardless, in an abundance of caution, Lighthouse List takes the position that its deadline to respond to the second amended complaint (Dkt. No. 1-4) in this Court is December 30, 2024. *See* Fed. R. Civ. P. 81(c)(2)(C).

7. No prior extensions have been granted by this Court.

WHEREFORE, Lighthouse List respectfully requests that, under Local Civil Rule 6.1(b), its deadline to answer or otherwise respond to plaintiffs' second amended complaint be extended by 14 days, through and including, January 13, 2025.

Respectfully submitted,

/s/ Ronald L. Davison
Ronald L. Davison

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Dated: December 26, 2024

ORDER

The above application is ORDERED GRANTED. Defendant Lighthouse List Company, LLC's time to answer, move or otherwise reply is extended to _____.

ORDER DATED:

By: _____

Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2024, the foregoing was filed electronically. Notice of this filing will be sent to the below listed attorneys of record by operation of the Court's electronic filing system, and via e-mail. The parties may access this filing through the Court's system.

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